

IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN
DISTRICT OF OHIO EASTERN
DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

JUN 30 2025 3:10 P

U.S. DISTRICT COURT
SOUTHERN DISTRICT
OF OHIO-COLUMBUS

BRANDON C. HELMAN,

Plaintiff,

v.

JPMORGAN CHASE BANK,
NATIONAL ASSOCIATION,

Defendant.

Case No. 2:25-cv-00589-JLG-CMV

HONORABLE JUDGE JAMES L. GRAHAM

**PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS
AND DEMAND FOR RETRACTION**

Plaintiff BRANDON CHARLES HELMAN respectfully opposes Defendant JPMORGAN CHASE BANK, N.A. and their legal counsel's Motion to Dismiss. The motion misrepresents not only the Plaintiff's claims of equity mentioned in the original language(s) presented in the Complaint, but also relies heavily on irrelevant opinions by other court(s) in reference to "sovereign citizen" and "vapor money" theories. Neither of these presumptions is present in the aforementioned Complaint by the Plaintiff, and do not represent the views purported by their authorized representative. The Plaintiff's case is based on valid legal claims supported by factual allegations that meet the standards set by *Ashcroft v. Iqbal*, 556 U.S. 662 (2009), and *Bell Atl. Corp. v. Twombly*, 550 U.S. 544 (2007).

Defendant JP MORGAN CHASE BANK, N.A. and their legal counsel have presented arguments as a distraction from the subject matter and real issues in this case, and do not, under such circumstances, justify as grounds for dismissal. The Honorable Court should deny the motion to dismiss and require the Defendant to answer the claims presented in the Complaint, and, by Order of the Court, issue a retraction of damaging statements made against the Plaintiff.

The memorandum of law in support for dismissal, presented by the Defendant, makes several presumptions about the Plaintiff and the authorized representative, in an attempt to discredit the validity of their claim. The Defendant and their legal counsel have collectively engaged in a tort action libel by way of calling the Plaintiff's authorized representative "Mr. Helman". This is defamation as defined in Cambridge Advanced Learner's Dictionary & Thesaurus, "Mr." (abbrev.) or "Mister" an informal and sometimes rude form of address for a man whose name you do not know. If it pleases the Honorable Court, any further such references to the Plaintiff's counsel are to call him by his given first name at birth only, which is Brandon.

The Defendant also fails to recognize two separate parties involved bringing this case. First,

the Plaintiff is an entity known as *Ens Legis* name “BRANDON CHARLES HELMAN/BRANDON C. HELMAN” is a legal fiction, a transmitting utility, sole proprietorship (49 USC § 40102(a)(15), U.S. Citizen under 8 U.S. Code § 1401(a), and is identified by the Social Security Account number ending in 5144. Second, Pro Se Litigant or attorney-in-fact for the Plaintiff is Brandon C. Helman, a living Freeman of the Union, non-citizen national of The United States of America Republic (8 U.S. Code § 1101(22)(B), a white state citizen, and natural born Ohioan under 8 U.S. Code § 1101 (23). The nature of the established relationship is outlined both in a Power of Attorney document sent by way of USPS Certified Mail to CHASE CARD SERVICES on January 29th, 2025 and by way of FAX to their customer service department on March 17th, 2025.

Furthermore, this information is affirmed by the attached “Affidavit: Novation, Orders, Clarification and Statement of Value and Consideration” sent by way of USPS Certified Mail on March 10th, 2025 and again by way of FAX on March 17th, 2025. The Plaintiff is the Principal account holder and debtor in this relationship and the living man is the Agent, Secured Party, Creditor, and Beneficiary of the assets located in the trust, made in their likeness, signed by law in the Social Security Act of 1935, under the purview of the C’estui Que Vie Act of 1666.

The Defendant and their legal counsel introduced the Federal Question in presentation of this case to this higher Honorable Court, removing it from the original venue in State of Ohio court jurisdiction, without the consent of the Plaintiff. This intentional move was performed to not only intimidate the Plaintiff, but also act as an attempt to nullify their certain claims made under the Uniform Commercial Code. While not codified at the Federal level, does still carry enforcement under the color of the law at all States within this Republic. The Defendant’s counsel also failed initially to include the Jury Demand in the submission of this case in an attempt to violate the Plaintiff’s protected Seventh Amendment right under the Constitution of The United States of America. These actions demand inquiry by Honorable Judge James L. Graham, and, all attorneys of record must be held accountable for these actions up to and including charges of

Contempt, official review of their standings with the BAR Association, and potentially, disbarment.

The Defendant's motion to dismiss with prejudice has been made in bad faith, further, by intimidation and illegal discrimination, in an attempt to silence and suppress the certain rights of the Plaintiff in audi alteram partem, guaranteed by The First Amendment of The United States Constitution, The Right of Redress, and Consumer Bill of Rights. This case is being presented by a private man that wishes to live in peace and harmony, but that has become impossible living under such duress. The damages sought should actually be greater in volume, but greed is unbecoming. All that has been witnessed in attempts to remedy this situation has been denial, blame, and undue burden accompanied by mental distress and anguish. If fraudulent corporations are allowed to continue behaving in this way, all people will become enslaved under the false auspices of debt and fiat currency.

Dated: June 24th, 2025

RESPECTFULLY SUBMITTED,

BRANDON CHARLES HELMAN

BY: /s/ Brandon C. Helman
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CERTIFICATE OF SERVICE

I hereby certify that on June 24th, 2025, a copy of the foregoing was filed with the Clerk of this Court by way of regular U.S. mail. Further, all counsel of record were served with the same via regular U.S. mail and regular e-mail.

/s/ Brandon C. Helman

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